

Jeffrey G. Bradford, OSB No. 133080
E-mail: jeff.bradford@tonkon.com
TONKON TORP LLP
888 SW 5th Ave., Suite 1600
Portland, Oregon 97204
Telephone: (503) 802-5724

John W. McGuinness, *admitted pro hac vice*
Email: JMcGuinness@manatt.com
A. Paul Heeringa, *admitted pro hac vice*
Email: pheeringa@manatt.com
MANATT, PHELPS & PHILLIPS, LLP
151 N. Franklin Street, Suite 2600
Chicago, IL 60606
Telephone: (312) 529-6308

Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

JESSICA MURCH, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

GPS CAPITAL MARKETS, LLC,

Defendant.

Case No. 3:24-cv-01854-SB

**UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO
PLAINTIFF'S OBJECTIONS TO THE
MAGISTRATE'S FINDINGS AND
RECOMMENDATIONS ON
DEFENDANT'S MOTION TO
DISMISS/STRIKE [ECF NO. 29]**

Defendant GPS Capital Markets, LLC ("Defendant") respectfully moves, unopposed, to the Court extend the deadline for Defendant to respond to Plaintiff's Objections (*see* ECF No. 33) to the Magistrate Judge's Findings and Recommendations on Defendant's Motion to Dismiss/Strike Plaintiff's Complaint (*see* ECF No. 29) by a period of at least fourteen (14) days, up to and including **August 4, 2025**, or however long the Court deems appropriate. This additional

time is requested because Defendant's counsel have various personal and professional scheduling conflicts with the current deadline (which is presently July 21, 2025), including several briefs and hearings due in other matters around the same time and out-of-town travel, making preparation of an adequate response to Plaintiff's lengthy Objections very difficult if not impossible by the current deadline. And as the Court may recall, Plaintiff had significantly more time to prepare her Objections than was initially given, with the parties agreeing to extend her deadline via joint motion. *See* ECF No. 31. In fairness, Defendant should be afforded additional time to respond.

Accordingly, Defendant's counsel conferred with Plaintiff's counsel (Anthony Paronich) on July 15, 2025, who confirmed in writing the same day that Plaintiff does not oppose the requested extension. This extension is requested in good faith, will not prejudice anyone, will not impact the timely resolution of this matter, and is in the interest of justice. No other case deadlines will be impacted, and the requested extension is modest and unopposed. Therefore, Defendant submits that there is adequate "good cause" for the extension for at least the reasons above.

Dated: July 15, 2025

Respectfully submitted,

By: /s/ A. Paul Heeringa
 John W. McGuinness, *admitted pro hac vice*
 Email: JMcGuinness@manatt.com
 A. Paul Heeringa, *admitted pro hac vice*
 Email: pheeringa@manatt.com
 MANATT, PHELPS & PHILLIPS, LLP
 151 N. Franklin Street, Suite 2600
 Chicago, IL 60606
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 Telephone: (503) 802-5724

Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

DATED this July 15, 2025.

/s/ A. Paul Heeringa